

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for use of the Clerk of Court for the purpose of initiating the civil docket sheet.

PLAINTIFFS

Raj K. Patel

DEFENDANTS

Neal K. Patel

ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER)

pro se

ATTORNEYS (IF KNOWN)

CAUSE OF ACTION (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE)
(DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY)

strict liability; breach of contract-in-law (ministerial duty); battery; negligence; constructive fraud; disbarment

Has this action, case, or proceeding, or one essentially the same been previously filed in SDNY at any time? No ☒ Yes ☐ Judge Previously Assigned

If yes, was this case Vol. ☐ Invol. ☐ Dismissed. No ☐ Yes ☐ If yes, give date _____ & Case No. _____

IS THIS AN INTERNATIONAL ARBITRATION CASE?

No ☐

Yes ☐

(PLACE AN [x] IN ONE BOX ONLY)

NATURE OF SUIT

TORTS

ACTIONS UNDER STATUTES

CONTRACT

- [] 110 INSURANCE
[] 120 MARINE
[] 130 MILLER ACT
[] 140 NEGOTIABLE INSTRUMENT
[] 150 RECOVERY OF OVERPAYMENT & ENFORCEMENT OF JUDGMENT
[] 151 MEDICARE ACT
[] 152 RECOVERY OF DEFAULTED STUDENT LOANS (EXCL VETERANS)
[] 153 RECOVERY OF OVERPAYMENT OF VETERAN'S BENEFITS
[] 160 STOCKHOLDERS SUITS
[] 190 OTHER CONTRACT
[] 195 CONTRACT PRODUCT LIABILITY
[] 196 FRANCHISE

PERSONAL INJURY

- [] 310 AIRPLANE
[] 315 AIRPLANE PRODUCT LIABILITY
[] 320 ASSAULT, LIBEL & SLANDER
[] 330 FEDERAL EMPLOYERS' LIABILITY
[] 340 MARINE
[] 345 MARINE PRODUCT LIABILITY
[] 350 MOTOR VEHICLE
[] 355 MOTOR VEHICLE PRODUCT LIABILITY
[] 360 OTHER PERSONAL INJURY
[] 362 PERSONAL INJURY - MED MALPRACTICE

ACTIONS UNDER STATUTES

CIVIL RIGHTS

- [] 440 OTHER CIVIL RIGHTS (Non-Prisoner)
[] 441 VOTING
[] 442 EMPLOYMENT
[] 443 HOUSING/
[] 445 AMERICANS WITH DISABILITIES - EMPLOYMENT
[] 446 AMERICANS WITH DISABILITIES - OTHER
[] 448 EDUCATION

PERSONAL INJURY

- [] 367 HEALTHCARE/
PHARMACEUTICAL PERSONAL INJURY/PRODUCT LIABILITY
[] 365 PERSONAL INJURY PRODUCT LIABILITY
[] 368 ASBESTOS PERSONAL INJURY PRODUCT LIABILITY

PERSONAL PROPERTY

- [] 370 OTHER FRAUD
[] 371 TRUTH IN LENDING
[] 380 OTHER PERSONAL PROPERTY DAMAGE
[] 385 PROPERTY DAMAGE PRODUCT LIABILITY

PRISONER PETITIONS

- [] 463 ALIEN DETAINEE
[] 510 MOTIONS TO VACATE SENTENCE
[] 530 HABEAS CORPUS
[] 535 DEATH PENALTY
[] 540 MANDAMUS & OTHER

PRISONER CIVIL RIGHTS

- [] 550 CIVIL RIGHTS
[] 555 PRISON CONDITION
[] 560 CIVIL DETAINEE CONDITIONS OF CONFINEMENT

FORFEITURE/PENALTY

- [] 625 DRUG RELATED SEIZURE OF PROPERTY
21 USC 881
[] 690 OTHER

PROPERTY RIGHTS

- [] 820 COPYRIGHTS
[] 830 PATENT
[] 835 PATENT-ABBREVIATED NEW DRUG APPLICATION
[] 840 TRADEMARK
[] 880 DEFEND TRADE SECRETS ACT

LABOR

- [] 710 FAIR LABOR STANDARDS ACT
[] 720 LABOR/MGMT RELATIONS
[] 740 RAILWAY LABOR ACT
[] 751 FAMILY MEDICAL LEAVE ACT (FMLA)
[] 790 OTHER LABOR LITIGATION
[] 791 EMPL RET INC SECURITY ACT (ERISA)

IMMIGRATION

- [] 462 NATURALIZATION APPLICATION
[] 465 OTHER IMMIGRATION ACTIONS

BANKRUPTCY

- [] 422 APPEAL
28 USC 158
[] 423 WITHDRAWAL
28 USC 157

SOCIAL SECURITY

- [] 861 HIA (1395ff)
[] 862 BLACK LUNG (923)
[] 863 DIWC/DIWW (405(g))
[] 864 SSID TITLE XVI
[] 865 RSI (405(g))

FEDERAL TAX SUITS

- [] 870 TAXES (U.S. Plaintiff or Defendant)
[] 871 IRS-THIRD PARTY
26 USC 7609

OTHER STATUTES

- [] 375 FALSE CLAIMS
[] 376 QUI TAM
[] 400 STATE REAPPORTIONMENT
[] 410 ANTITRUST
[] 430 BANKS & BANKING
[] 450 COMMERCE
[] 460 DEPORTATION
[] 470 RACKETEER INFLUENCED & CORRUPT ORGANIZATION ACT (RICO)
[] 480 CONSUMER CREDIT
[] 485 TELEPHONE CONSUMER PROTECTION ACT
[] 490 CABLE/SATELLITE TV
[] 850 SECURITIES/COMMODITIES/EXCHANGE
[] 890 OTHER STATUTORY ACTIONS
[] 891 AGRICULTURAL ACTS
[] 893 ENVIRONMENTAL MATTERS
[] 895 FREEDOM OF INFORMATION ACT
[] 896 ARBITRATION
[] 899 ADMINISTRATIVE PROCEDURE ACT/REVIEW OR APPEAL OF AGENCY DECISION
[] 950 CONSTITUTIONALITY OF STATE STATUTES

REAL PROPERTY

- [] 210 LAND CONDEMNATION
[] 220 FORECLOSURE
[] 230 RENT LEASE & EJECTMENT
[] 240 TORTS TO LAND
[] 245 TORT PRODUCT LIABILITY
[] 290 ALL OTHER REAL PROPERTY

Check if demanded in complaint:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DO YOU CLAIM THIS CASE IS RELATED TO A CIVIL CASE NOW PENDING IN S.D.N.Y. AS DEFINED BY LOCAL RULE FOR DIVISION OF BUSINESS 13? IF SO, STATE:

DEMAND \$ 334000000 OTHER _____ JUDGE _____ DOCKET NUMBER _____

Check YES only if demanded in complaint

JURY DEMAND: ☐ YES ☒ NO

NOTE: You must also submit at the time of filing the Statement of Relatedness form (Form IH-32).

(PLACE AN ☒ IN ONE BOX ONLY)**ORIGIN**

- ☒ 1 Original Proceeding
 ☐ 2 Removed from State Court
 ☐ 3 Remanded from Appellate Court
 ☐ 4 Reinstated or Reopened
 ☐ 5 Transferred from (Specify District)
 ☐ 6 Multidistrict Litigation (Transferred)
 ☐ 7 Appeal to District Judge from Magistrate Judge
- ☐ a. all parties represented
 ☐ b. At least one party is pro se.
- ☐ 8 Multidistrict Litigation (Direct File)

(PLACE AN ☒ IN ONE BOX ONLY)**BASIS OF JURISDICTION****IF DIVERSITY, INDICATE CITIZENSHIP BELOW.**

- ☐ 1 U.S. PLAINTIFF
 ☐ 2 U.S. DEFENDANT
 ☐ 3 FEDERAL QUESTION
 ☒ 4 DIVERSITY
- (U.S. NOT A PARTY)

CITIZENSHIP OF PRINCIPAL PARTIES (FOR DIVERSITY CASES ONLY)

(Place an [X] in one box for Plaintiff and one box for Defendant)

CITIZEN OF THIS STATE	PTF [] 1	DEF <input checked="" type="checkbox"/> 1	CITIZEN OR SUBJECT OF A FOREIGN COUNTRY	PTF DEF [] 3 [] 3	INCORPORATED and PRINCIPAL PLACE OF BUSINESS IN ANOTHER STATE	PTF DEF [] 5 [] 5
CITIZEN OF ANOTHER STATE	<input checked="" type="checkbox"/> 2	[] 2	INCORPORATED or PRINCIPAL PLACE OF BUSINESS IN THIS STATE	[] 4 [] 4	FOREIGN NATION	[] 6 [] 6

PLAINTIFF(S) ADDRESS(ES) AND COUNTY(IES)

6850 East 21st Street
Indianapolis, IN 46219
Marion County

DEFENDANT(S) ADDRESS(ES) AND COUNTY(IES)

Neal Patel, AA, BA, JD
Katten Muchin Rosenman LLP
50 Rockefeller Plaza
New York, NY 10020-1605 // New York County

DEFENDANT(S) ADDRESS UNKNOWN

REPRESENTATION IS HEREBY MADE THAT, AT THIS TIME, I HAVE BEEN UNABLE, WITH REASONABLE DILIGENCE, TO ASCERTAIN THE RESIDENCE ADDRESSES OF THE FOLLOWING DEFENDANTS:

COURTHOUSE ASSIGNMENT

I hereby certify that this case should be assigned to the courthouse indicated below pursuant to Local Rule for Division of Business 18, 20 or 21.

Check one: THIS ACTION SHOULD BE ASSIGNED TO: ☐ WHITE PLAINS ☒ MANHATTAN

DATE

SIGNATURE OF ATTORNEY OF RECORD

ADMITTED TO PRACTICE IN THIS DISTRICT

[] NO

[] YES (DATE ADMITTED Mo. _____ Yr. _____)

Attorney Bar Code #

RECEIPT #

Magistrate Judge is to be designated by the Clerk of the Court.

Magistrate Judge _____ is so Designated.

Ruby J. Krajick, Clerk of Court by _____ Deputy Clerk, DATED _____.

UNITED STATES DISTRICT COURT (NEW YORK SOUTHERN)

Clear Form

Save

Print

**IN THE UNITED STATES SOUTHERN DISTRICT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

THE EXCELLENT THE EXCELLENT RAJ
K. PATEL, from all capacities,

Plaintiff No. _____

v.

Dated: October 4, 2023

NEAL K. PATEL and SANJANA KUMAR,

JURY TRIAL DEMANDED

Defendants

PRO SE COMPLAINT

I, T.E., T.E. Mr. Raj K. Patel (Rama CCCX) (*pro se*), respectfully move this United States Southern District for the Southern District of New York for a remedy. Erickson v. Pardus, 551 U.S. 89, 94 (2007) (all documents filed *pro se* are liberally construed). 28 U.S.C. § 1332. 42 U.S.C. 2000bb et seq. 28 U.S.C. § 1331.

PARTIES

PLAINTIFF: CITIZEN OF INDIANA.

Raj Patel, AA, BA
6850 East 21st Street
Indianapolis, IN 46219
317-450-6651
raj@rajpatel.live
rajp2010@gmail.com

DEFENDANT, CITIZEN OF NEW YORK:

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309 5th Avenue, Apt. 24A
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Sanjana Kumar, AA, BS, PsychD
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New York, NY 10016
p: +1-404-804-2181

STATEMENT OF FACTS

1. T.E., T.E. (“**T.E.,E.**”) Mr. Raj K. Patel (Rama CCCX) is the Plaintiff (*pro se*).
 - A. From 2009-2010, I was the Student Body President of the Brownsburg Community School Corporation (“B.C.S.C.”) (corporate sovereign 2009-present) in Brownsburg, Indiana.
 - B. From 2013-2014, I was the Student Government Association President of Emory University, Inc. (corporate sovereign 2013-present) in Atlanta, Georgia. In the Summer of 2012, I studied abroad at Yonsei University in Seoul, South Korea.
 - C. Raj made porn in middle school and high school and was recently forced to leave law school from the University of Notre Dame and has constantly expressed sensitivity towards Neal’s recent sexually charged name calling.
 - D. Neal knows.
 - E. Porn stars control the pleasure.
2. Neal K. Patel is the co-younger brother of Plaintiff T.E., T.E. Mr. Patel. Neal is married to Sanjana Kumar who has a PschyD.
3. Since watching *Gangubai Kathiawadi*, a 2022 *Bollywood* movie, Neal has called Raj “*gangu*” and “*ganglia*” a name of a child prostitute who become the madame of the facility, starting from existing the movie theater.

4. Raj left Neal at the restaurant they were eating at after the movie because Neal could not stop calling him the name. Raj and Neal's parents picked Neal up.
5. On May 17, Neal called me that, and I told him not to call me that again in writing.
6. On Thursday, June 8th when Neal arrived from New York to Indianapolis, as soon as he entered into my motel room he said "sup, gangu" or "sup, ganglia."
7. Patel has been suffering from stress, markedly since December 2017.
8. I demanded an apology from Neal which he has failed to give.
9. Neal is married to Sanjana, from the UAE, who holds a green card.
10. I had initially sent Neal a demand with a draft complaint to stop calling me this on June 12.
11. Neal visited Indianapolis after June 12th (and not the visit for the 4th of July weekend), and he walked into my room earnestly and said, "what's up, ganga."
12. Raj has suffered from severe stress or incident since 2017, possible a matter scheduled under unconstitutional "family governance." See e.g., Patel v. United States, No. 2:23-cv-07763-TJH-PD (C.D. Cal. 202_).
- A. "Family" means also family, nation, and corporate.
 - B. This is not "popular."
 - C. It is "mean": from the low class, desperate, and the unintelligent.
13. Neal and Raj are in a brotherly contract not to commit these acts. Neal is mad at Raj is not going to Neal and Sanjana's marriage ceremony in the UAE in January 2023, even though they lawfully wedded in Marion County, Indiana due to COVAID, due to the stigmatizing stress and peril Raj is in. See e.g., Patel v. United States, No. 2:23-cv-07763-TJH-PD (C.D. Cal. 202_).

14. This complaint is not intended for any *res judicata* on any priorly filed claims or future claims against Defendant or other parties.
15. This complaint to this court follows: venue is proper because Plaintiff has a filing bar in the S.D.I.N.

CLAIMS

16. The court might find it proper to terminate family governance and restore T.E.,E. Patel's Ordered Liberties before appearing before this court. 28 U.S.C. §§ 1651 & 1361. Obergefell v. Hodges, 576 U.S. 644, 663 (2015) (district courts must ensure this vision is created and enforced). Dobbs v. Jackson Women's Health Org., 142 S. Ct. 2228, 2236 & 2238 (2022) (district courts must ensure that civil liberties are administered in a orderly fashion, with T.E.,E. being a priority). Poindexter v. Greenhow, 114 U.S. 270, 290 (1885) (duties the government owes to state actors/designers/players like T.E.,E. Patel). Cf. Dred Scott v. Sandford, 60 U.S. (19 How.) 393 (1857) (superseded in part by the Fourteenth Amendment; right to sue).
17. Neal and Sanjana are lawfully married. They are responsible for each other's legal and equitable liabilities. They are alter egos and subject to vicarious liability, and respondent superior.

CLAIM 1. BATTERY (VERBAL)

18. Plaintiff incorporates paragraphs 1 through 17 above.
19. Neal orally called me a name "gangu" that was offensive and harmful.
- A. This is true for the May 17th incident, the first incident.
- B. This is also true for June 8th incident, the second incident.

20. It was offensive and harmful because it was a name of a low-class person and challenging mine and Neal's *varna*, caste, and class. 42 U.S.C. § 2000bb-3(a).
21. Neal knows that Raj is a lifelong Democrat and a victor of the debate in the Obergefell v. Hodges, 576 U.S. 644, 663 (2015).
22. Raj found Neal's comments harmful and offensive and debasing because of Neal's marriage with Sanjana in the Islamic world, the UAE, and Raj's sex tape/pornography past.
23. Neal's comment was prejudicial, racist, bigoted, and culturally incompetent.
24. Neal meant to say what he said.
25. Neal knew not to call me name; in fact, after re-kindling our relationship.
26. Neal has an underlying theme of fighting me for self-control. Neal knows that these acts were crossing the line.
27. Neal is the but for cause and proximate cause.
28. Raj suffered damages, including but not limited to mental pain and suffering.
 - A. Raj was justified in not punching Neal because of necessity (Ordered Liberty) (image/status) in the free of having police conflict while being under family governance.

CLAIM 2. STRICT LIABILITY – BATTERY (VERBAL)

29. Plaintiff incorporates paragraphs 1 through 28 above.
30. Going to a motel and using sexually charged language in an inherently dangerous activity.
31. The community and public health requires offensive and harmful conduct with a sexual undertone or particularized pretext be held accountable.
32. Neal committed the conduct.
33. Neal is the cause.

34. Raj suffered damages.

CLAIM 3. STRICT LIABILITY – TRESPASS (VERBAL)

35. Plaintiff incorporates paragraphs 1 through 34 above.

36. Going to a motel and using sexually charged language in an inherently dangerous activity.

37. The community and public health requires offensive and harmful conduct with a sexual undertone or particularized pretext be held accountable.

38. Neal committed the conduct.

39. Neal is the cause.

40. Raj suffered damages.

CLAIM 4. HARASSMENT

41. Plaintiff incorporates paragraphs 1 through 40 above.

42. Neal has caused emotional and social harm to my own good name that has helped me become a state figure protected by Ordered Liberty.

43. Neal is the cause.

44. Raj suffered damages.

CLAIM 4. TRESPASS OF SCOPE

45. Plaintiff incorporates paragraphs 1 through 44 above.

46. Neal came walking into my room.

47. Neal than called me a name.

48. Neal knows he is not supposed to annoy me or disrespect me in anyway, or I will kick him out of my room, even if he is playing with his nibling, Arlo, my Morkie.

49. Neal is the cause.

50. Raj suffered damages.

CLAIM 5. INVASION OF PRIVACY

51. Plaintiff incorporates paragraphs 1 through 50 above.

52. Raj has a reasonable expectation of privacy in his room from being battered by Neal and not having to think of sexualized things by being triggered of things he does not want to think of.

53. Neal is the cause.

54. Raj suffered damages.

CLAIM 6. NEGLIGENCE BREACH OF SPECIFIC (SOCIAL) DUTY

55. Plaintiff incorporates paragraphs 1 through 54 above.

56. Duty: Neal has a social duty under the United States Constitution and International Covenant of Political and Social not to violate sexual minorities.

57. Duty: Neal has a social duty under the United States Constitution and International Covenant of Political and Social to be loyal to incumbent and former elected officials pursuant to Ordered Liberty.

58. Breach: Neal breached each of duties with deliberate indifference and a way an ordinary prudent person would not do and conscious disregard.

59. Causation: Neal is the but for cause and proximate cause of the breach of duty that caused harm.

60. Raj suffered damages.

CLAIM 7. BREACH OF CONTRACT-IN-LAW DUTY

61. Plaintiff incorporates paragraphs 1 through 60 above.

62. Duty: Neal owes T.E.,E. Mr. Patel a contract-in-law ministerial duty from the United States Constitution to stay loyal and aid T.E.,E. Mr. Patel even in his weakest state, especially

when by him. Sanjana owes a contract-in-law ministerial duty to stay loyal to T.E.,E. Raj Patel because she is a legal permanent residence, student visa holder, naturalized-citizen, not natural-born who is bound by an Oath of an Allegiance to T.E.,E. Patel, fellow alumni of Emory University. The law merchant and corporate law requires the same from Neal and Sanjana.

63. Duty: Neal owes T.E.,E. Mr. Patel a contract-in-law ministerial duty from the United States Constitution to not call T.E.,E. Mr. Patel names. The law merchant and corporate law requires the same from Neal and Sanjana.

64. Duty: Neal owes T.E.,E. Mr. Patel a contract-in-law duty from the United States Constitution to not call T.E.,E. Mr. Patel for his Ordered Liberty to call people names. The law merchant and corporate law requires the same from Neal and Sanjana.

65. Duty: Neal owes T.E.,E. Mr. Patel a contract-in-law duty from the United States Constitution to not call T.E.,E. Mr. Patel for aid T.E.,E. Patel's recovery and increase T.E.,E. Patel's subjective pleasure (under the United States Constitution's benevolent nature and sex-positivity). The law merchant and corporate law requires the same from Neal and Sanjana.

66. Breach: Neal breached each of duties with deliberate indifference and a way an ordinary prudent person would not do and conscious disregard and unreasonable behavior.

67. Causation: Neal is the but for cause and proximate cause of the breach of duty that caused harm.

68. Damages: Raj suffered damages.

CLAIM 8. STRICT LIABILITY – HONEST SERVICES FRAUD

69. Plaintiff incorporates paragraphs 1 through 68 above.

70. Neal and Sanjana violated the public health requirements of honest services fraud by breaching the terms of the contract-in-law, the United States Constitution. See e.g., 18 U.S.C. §1346.

71. Neal and Sanjana violated the public health requirements by travelling across inter-state commerce to call Raj a name. 18 U.S.C. §§ 241 et seq.

72. Damages: Raj suffered damages.

CLAIM 9. CONSTRUCTIVE FRAUD

73. Plaintiff incorporates paragraphs 1 through 72 above.

74. Neal and Sanjana made a false promise not to provoke Raj by calling him “gangu” because he did it anyway.

75. Neal and Sanjana did this to Raj even though he took an Oath to the Bar not to commit these acts.

76. Neal and Sanjana violated the public trust and confidence in the Bar of not only applying the law but living in accord with the United States Constitution. U.S. const. art. IV, § 2. 42 U.S.C. § 2000bb-3(a).

77. T.E.,E. Raj, Neal, and Sanjana’s *dharmic* religion of Hinduism demands that he stay loyal and submissive to T.E.,E. Patel, but Neal did not when he called T.E.,E. Patel an offensive, harmful, and disparaging name. 42 U.S.C. § 2000bb-3(a).

78. Neal’s conduct violates the public interest of not sexually battering and causing mental health and suffering, championed by the First Lady (current and former), an effort all national universities in the United States promote, someone and preventing disorderly conduct.

79. Raj suffered damages.

CLAIM 10. STRICT LIABILITY – FRAUD

80. Plaintiff incorporates paragraphs 1 through 79 above.

81. Neal is the cause.

82. Raj suffered damages.

CLAIM 10. DISBARMENT

83. Plaintiff incorporates paragraphs 1 through 82 above.

84. Neal own's actions caused a breach of bar duties to uphold the constitution or not influence politics and has recklessly attacked contemporary human decency and Supreme Court case law such as Obergefell v. Hodges, 576 U.S. 644, 663 (2015) which is sworn to uphold. Dobbs v. Jackson Women's Health Org., 142 S. Ct. 2228, 2236 & 2238 (2022).

85. Neal is the cause.

86. Raj suffered damages.

DEMAND FOR RELIEF

WHEREFORE, The Excellent, The Excellent Raj K. Patel, with the interest further decency within our Nation and upholding our Constitution, asks this United States District Court for the Southern District of New York hold Neal and Sanjana liable and grant the following:

Incidental Damages.

87. Plaintiff incorporates paragraphs 1 through 86 above.

88. The cost of arguing and filing a complaint. \$10,000,000.00.

89. Having to terminate family governance in order to appear before the court. \$10,000,000.00.

Compensatory Damages.

90. Plaintiff incorporates paragraphs 1 through 89 above.

91. Complete transfer of money, wealth, and power distributed to him.

92. Patel's aggregate damages. \$65,000,000.00.

Expectation Damages.

93. Plaintiff incorporates paragraphs 1 through 92 above.

94. Raj expected Neal not to commit these acts not only as his brother but also as a fellow alumnus of the Brownsburg Community School Corporation and Emory University and a member of the Bar who is aid to State figures like T.E.,E. Raj Patel.

Restitution Damages.

95. Plaintiff incorporates paragraphs 1 through 94 above.

96. Neal has achieved common law glory by calling me a name and is using me to remediate for his own failed goals. \$1,000,000.00.

97. Neal has achieved common law glory by calling me a name and is using me to remediate for his own failed goals. \$1,000,000.00.

98. Neal had social justice by calling me name. \$50,000,000.00.

Parasitic Damages.

99. Plaintiff incorporates paragraphs 1 through 98 above.

100. Neal has caused additional damages to me while knowing that I am sick, as shown by my physiology and stress and depression diagnosis. \$500,000,000.00.

Intentionally Infliction of Emotional Distress Damages.

101. Plaintiff incorporates paragraphs 1 through 100 above.

102. Neal has caused additional damages to me while knowing that I am sick. \$500,000,000.00.

Mental Health & Pain Suffering Damages.

103. Plaintiff incorporates paragraphs 1 through 102 above.

104. Raj has suffered severally from this mental pain and suffering. \$40,000,000.00.

Oppressive Damages.

105. Plaintiff incorporates paragraphs 1 through 104 above.

106. Raj has suffered severally from this mental pain and suffering. \$40,000,000.00.

Money Damages.

107. Plaintiff incorporates paragraphs 1 through 106 above.

108. Raj has suffered severally from this mental pain and suffering. \$40,000,000.00.

Consequential Damages.

109. Plaintiff incorporates paragraphs 1 through 108 above.

110. Raj has suffered severally from this mental pain and suffering. \$40,000,000.00.

Harm To Reputation Damages.

111. Plaintiff incorporates paragraphs 1 through 110 above.

112. Raj has suffered severally from this mental pain and suffering. \$40,000,000.00.

Order of Specific Performance Damages.

113. Plaintiff incorporates paragraphs 1 through 112 above.

114. Have Neal issue an apologize to Raj.

115. Modify Neal's oath to the bar that he remain loyal to me under Article IV, § 2.

Other matters.

116. Plaintiff incorporates paragraphs 1 through 115 above.

117. Award earned damages, at least nominal damages. Ind. const. art. 1, § 12.

118. Other remedies which the court might deem fit. See e.g., 28 U.S.C. § 1651.

Respectfully submitted,

/s/ Raj K. Patel
Rama CCCX
T.E., T.E. Raj K. Patel, AA, BA*, JD Candidate** (*pro se*)
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Marion County
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raj2010@gmail.com
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T.E. Mr. President/Student Body President, Student Gov't Ass'n of
Emory U., Inc. 2013-2014 (corp. sovereign 2013-present)

T.E. Mr. Student Body President, Brownsburg Cmty. Sch.
Corp./President, Brownsburg High Sch. Student Gov't 2009-
2010 (corp. sovereign 2009-present)

Rep. from the Notre Dame L. Sch. Student B. Ass'n to the Ind. St.
B. Ass'n 2017

Deputy Regional Director, Young Democrats of Am.-High Sch.
Caucus 2008-2009

Co-Founder & Vice Chair, Ind. High Sch. Democrats 2009-2010

Vice President of Fin. (Indep.), Oxford C. Republicans of Emory U.,
Inc. 2011-2012

Intern, Marion Cnty. Clerk Elizabeth "Beth" White for Sec'y of St.
of the St. of Ind. 2014

**J.D. Candidate, Notre Dame L. Sch. (2015-17)

Volunteer, Barack Obama for America (2008)

Intern, Jill Long Thompson for Governor (2008)

*Political Science and Religion (cum laude), Emory University
Class of 2014

CERTIFICATE OF SERVICE

I certify that I served a copy of the foregoing *Pro Se* Complaint and Summons on 10/4/2023 to below individuals via the Clerk of Court:

Neal Patel

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Respectfully submitted,

/s/ Raj Patel
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rajp2010@gmail.com
www.rajpatel.live

Dated: October 4, 2023

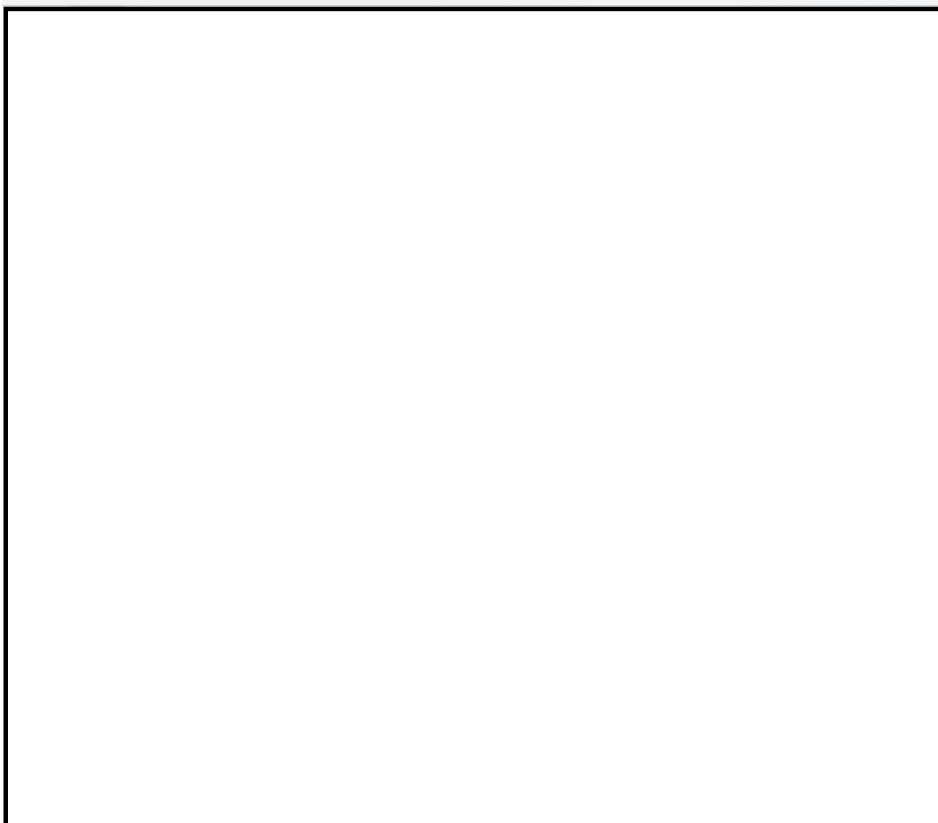
7:23

5G 34

EXHIBIT A



Neal >



Wed, May 17 at 12:54 AM

Sup gangila

1 Reply

Wed, May 17 at 2:56 AM

I'll sue you.

Sup gangila

If you don't stop with this sexual battery.

Thu, May 18 at 12:51 AM

Hey



iMessage

